

Rosemary M. Rivas (State Bar No. 209147)
Email: rrivas@zlk.com
LEVI & KORSINSKY, LLP
44 Montgomery Street, Suite 650
San Francisco, California 94104
Telephone: (415) 291-2420
Facsimile: (415) 484-1294

Donald J. Enright (admitted *pro hac vice*)
Email: denright@zlk.com
LEVI & KORSINSKY, LLP
1101 30th St., NW, Ste. 115
Washington, DC 20007
Telephone: (202) 524-4292
Facsimile: (202) 333-2121

Paul Jasper (State Bar no. 200138)
Email: paul.jasper@rimonlaw.com
RIMON, P.C.
One Embarcadero Center, Suite 400
San Francisco, CA 94111
Telephone: (415) 683-5472
Facsimile: (415) 870-4296

Eduard Korsinsky (to be admitted *pro hac vice*)
Email: ek@zlk.com
LEVI & KORSINSKY, LLP
30 Broad Street, 24th Floor
New York, New York 10004
Telephone: (212) 363-7500
Facsimile: (212) 636-7171

*Attorneys for Defendants
Justin Harkema and Crypto Media Group LLC*

*Attorneys for Lead Plaintiff Jon Holland
and Plaintiff Astley Davy*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

JON HOLLAND and ASTLEY DAVY,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

PARAGON COIN, INC., JESSICA VERSTEEG,
EGOR LAVROV, EUGENE "CHUCK"
BOGORAD, ALEX EMELICHEV, GARETH
RHODES, DAVID KALUSTOV, JAYCEON
TERRELL TAYLOR A/K/A/ "THE GAME,"
JUSTIN HARKEMA, and CRYPTO MEDIA
GROUP LLC,

Defendants.

Case No. 4:18-cv-00671-JSW

**STIPULATION AND ~~[PROPOSED]~~
ORDER RE DISMISSAL WITHOUT
PREJUDICE AS TO JUSTIN
HARKEMA AND CRYPTO MEDIA
GROUP LLC**

Judge: Hon. Jeffrey S. White

Case No. 4:18-cv-00671-JSW

**STIPULATION AND ~~[PROPOSED]~~ ORDER RE DISMISSAL WITHOUT PREJUDICE AS TO
JUSTIN HARKEMA AND CRYPTO MEDIA GROUP LLC**

Lead Plaintiff Jon Holland (“Holland”) and Plaintiff Astley Davy (“Plaintiff,” and together with Holland, “Plaintiffs”) and Defendants Justin Harkema (“Harkema”) and Crypto Media Group LLC (“Crypto Media,” and together with Harkema, “Defendants,” and collectively with Plaintiffs, the “Parties”) stipulate as follows:

WHEREAS, Plaintiffs filed their First Amended Class Action for Violation of Sections 12(a)(1) and 15(a) of the Securities Act of 1933 (the “Complaint”) in the above-captioned action (the “Action”) on June 22, 2018 (Dkt. No. 44);

WHEREAS, Defendants have not filed a response to the Complaint nor appeared in the Action and deny any liability as to all claims stated in the Complaint; and

WHEREAS, based on new evidence provided by Defendants, Plaintiffs have agreed to dismiss Defendants from the Action without prejudice.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO APPROVAL BY THIS COURT, by these Parties, through counsel, as follows:

1. The Action shall be dismissed without prejudice, solely as to defendants Harkema and Crypto Media Group LLC, pursuant to Rule 41(a)(1)(A) of the Federal Rules of Civil Procedure; and
2. Each Party shall bear their own attorneys’ fees, expenses, and costs.

Dated: July 11, 2018

LEVI & KORSINSKY, LLP

RIMON, P.C.

/s/ Donald J. Enright
Donald J. Enright, admitted *pro hac vice*

/s/ Paul Jasper
Paul Jasper

Attorneys for Lead Plaintiff JON HOLLAND
and Plaintiff ASTLEY DAVY

Attorneys for Defendants Justin Harkema and
Crypto Media Group LLC

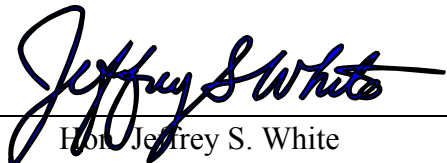
~~PROPOSED~~ ORDER

Based on the Stipulation submitted by the Parties, and good cause being shown therefore, the court hereby GRANTS the Parties' Stipulation. The Court hereby orders as follows:

1. The Action shall be dismissed without prejudice, solely as to Defendants Justin Harkema and Crypto Media Group LLC, pursuant to Rule 41(a)(1)(A) of the Federal Rules of Civil Procedure.
2. Each Party shall bear its own attorneys' fees, expenses and costs.

IT IS SO ORDERED.

Dated: July 16, 2018



Hon. Jeffrey S. White
United States District Court Judge